



**HUNTINGTON BEACH
WETLANDS CONSERVANCY**

A Nonprofit Corporation
www.hbwc.org

21900 Pacific Coast Highway
Huntington Beach, CA 92646
(714) 536-0141

California Energy Commission

**DOCKETED
12-AFC-02**

TN # 68793

DEC 06 2012

December 3, 2012

Felicia Miller
Project Manager,
Siting, Transmission & Environmental Protection Division
California Energy Commission
1516 Ninth Street, MS-2000
Sacramento, CA 95814

RE: Huntington Beach Energy Project, Docket No. 12-AFC-02

Dear Ms. Miller:

The Huntington Beach Wetlands Conservancy is a non-profit land trust that owns facilities and property immediately adjacent to the site of the proposed Huntington Beach Energy Project (the rebuild of the AES power generating facility). We would like to express our concerns regarding the possible impacts of the project.

(1) Public notices for the project state that it is bounded on the south by the Huntington State Beach and Pacific Coast Highway. That statement is not entirely correct. To the immediate south of the site is the Wetlands & Wildlife Care Center located at 21900 Pacific Coast Highway. Owned by the Conservancy, that property houses an interpretive and education center, and a regional wildlife care facility for the treatment of sick and injured wildlife.

Because of the sensitivity to noise and vibration of the wildlife at the facility, much of which is housed in outdoor caging, we are concerned that noise from the demolition and reconstruction of the generating facilities be minimized. We are also concerned that noise may disrupt the use of our interpretive center. Noise mitigation measures should be required to address these concerns.

(2) It is our understanding that no Environmentally Sensitive Habitat Area (ESHA) has been identified and addressed apart from the restored Magnolia Marsh southeast of the plant. That is not correct. To the immediate east of the project site, and north of the Magnolia Marsh, is the fully restored Upper Magnolia Marsh. That wetland area lies between the existing AES tank farm and the Huntington Beach Flood Control Channel. Impacts on that wetland area should be addressed.

(3) The Magnolia Marsh has been designated as the Conservancy's primary area for interpretive trail use and ecotourism. We have an observation deck over southwest corner of the marsh, and a pathway runs along the AES fence-line from the observation deck to the Upper Magnolia Marsh. At present, the AES plant is minimally screened for visual and noise impacts by a chain-link fence and a sparse and poorly maintained row of myoporum trees.

We are requesting that, as part of the rebuild project, more appropriate noise and visual screening be installed consistent with the public use of the Magnolia Marsh as resource for education and ecotourism. Specifically, we are asking that the chain-link fence be replaced with a concrete block wall of sufficient height to provide proper screening. An improved planting scheme should also be implemented to enhance the visual separation between the marsh pathway and the project site.

We appreciate the opportunity to provide our comments regarding the Huntington Beach Energy project, and we look forward to working with the Energy Commission and AES-- whom we consider to be a very good neighbor-- in addressing our concerns.

Please contact me should you require more information.

Sincerely

A handwritten signature in blue ink, appearing to read "Gordon W. Smith".

Gordon W. Smith, PhD
Chairman,
Huntington Beach Wetlands Conservancy